Overview of Comments

Some of the goals proposed in RM-11306; specifically, the expansion of the service to allow new modes of operation, and the expansion of the existing phone bands, would be of benefit to the Amateur Service.

However, RM-11306 also seeks to impose severe and unreasonable restrictions on the Amateur Service in general, and on how specific modes of operation are used, by creating a complex matrix of bandwidth-based regulations that affect existing modes, where no new regulations of these modes are needed.

The general theme of RM-11306 also suggests that innovation is only taking place in the Digital Communications arena. This is a very narrow view, and does not take into account the fact that innovation is taking place in other areas of the hobby. If RM-11306 were to be adopted, these other areas of experimentation and innovation could effectively be squelched.

With the modifications proposed herein, the (reported) major goals of RM-11306 - permitting of certain new modes of operation and expansion of the phone bands - can be realized without the undesirable negative side effects of other parts of the proposal.

Specific Items

1) The proposed Bandwidth Restrictions are not needed

As RM-11306 accurately points out on page 4, the Amateur Service is "fundamentally a technical service". It is not a commercial service, and therefore does not need, and should not have specific frequency response or "hard number" bandwidth restrictions, particularly with respect to existing modes and emission types.

Amateur operators have been operating under the current set of rules regarding phone, CW, RTTY and data operations for many years, and there is no need to re-regulate these modes or operations by imposing a specific, numeric bandwidth to them. Good practice has been quite successful for many years in keeping transmitted bandwidth in line with the particular operational mode.

The bandwidth of new, non-phone modes can be permitted under
FCC Rule 97.307 f (2), applying to all non-phone emissions.

This should be sufficient to allow new modes to be freely deployed, and offer sufficient guidelines for operational and technical standards with respect to interference to other stations using currently

existing modes.

Therefore, the following is proposed:

Amend section 97.305 as follows:

"(d) Uncategorized Emission Types: A station may transmit any emission not otherwise specified in this section, on any frequency where "Image" is permitted and if the frequency is authorized to the control operator's license. The bandwidth of the emission shall be subject to Section 97.307 f (2)."

2) Sub-Band Reallocations

RM-11306 proposes elimination or reduction of some mode based sub-bands, and this makes sense, given the current usage of the HF bands. There is significantly less CW / RTTY activity than phone activity, and an expansion of the phone band is a logical change. However, for historical reasons (if nothing else), it makes sense to reserve some portion of the HF bands for CW and RTTY exclusively.

Furthermore, as technology changes, there may be more operations that use automated or semi-automated transmissions of data. Since it is not known at this time the extent to which these technologies will be deployed, nor do we fully understand the compatibility (or incompatibility) between these automated technologies and traditional Amateur uses (such as phone and CW), it makes sense to (possibly temporarily) restrict these operations to certain portions of the Amateur bands. The Commission could consider a date, at which time and after an appropriate comment period, the restriction could be modified or eliminated.

The following modifications to section 97.305 are proposed:

A: The lowest 50kHz of the 80, 40, 20, 15, and 10 meter Amateur bands, and the lowest 25kHz of the 17 and 12 meter bands shall be specifically allocated for RTTY and data only, as currently defined in the regulations. The remainder of these bands shall be allocated for all permitted emission types.

B: Automatic and Semi-Automatic transmissions shall be permitted in the following sub-bands (Note: all other modes are also permitted in these sub-bands):

160 Meters: 1820-1850 kHz
80 Meters: 3550-3700 kHz
40 Meters: 7050-7150 kHz
20 Meters: 14050-14150 kHz
17 Meters: None
15 Meters: 21050-21200 kHz

12 Meters: None
10 Meters: 28050-28500 kHz

Suggestion: Perhaps a higher license class (maybe Extra Class?) should be required for automatic and semi-automatic transmissions.

3) Station Identification

The changes proposed in RM-11306 to section 97.119 (page 21, bottom section of RM-11306) make sense.

4) Automatically Controlled Stations

The changes proposed to section 97.221 (c) by RM-11306 make sense. The changes proposed to 97.221 (b) are covered above.

Best Regards,
Michael G. Monnier W8BAC
46741 Wright Ave.
Shelby Township, Michigan
48317